

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. \_\_\_\_\_  
18 U.S.C. § 1341  
18 U.S.C. § 2

**UNITED STATES OF AMERICA**

**vs.**

**FREDERICK BRADLEY NOWELL, SR.,  
a/k/a “Brad Nowell,”**

**Defendant.**

\_\_\_\_\_ /

**INFORMATION**

The United States Attorney charges that:

**GENERAL ALLEGATIONS**

At various times relevant to this Information:

1. The Redland Company, Inc., (hereinafter referred to as “Redland Company”), a Florida corporation, was an engineering construction company with offices located at 23799 S.W. 167<sup>th</sup> Avenue, Homestead, Florida. The Redland Company provided a broad range of services in the South Florida area, including road, bridge and sewage work, and excavation.

2. Defendant **FREDERICK BRADLEY NOWELL, SR.** was hired by the Redland Company in or around September 1994 as an Administrative Vice President, with various duties including the preparation of work estimates, the negotiation of contracts and subcontracts, and the approval of invoices and payments. In or around July 1996, **NOWELL** was named Vice President of the Redland Company.

3. The Redland Company maintained its operating account at Community Bank of Florida, in Homestead, Florida. **FREDERICK BRADLEY NOWELL, SR.** had signatory authority over the Redland Company operating account.

4. In or around October 1992, **FREDERICK BRADLEY NOWELL, SR.** established Nowell Group, Inc., a Florida corporation of which he was president.

5. **FREDERICK BRADLEY NOWELL, SR.** maintained a bank account at NationsBank, later known as Bank of America, in the name of Nowell Group, Inc. **NOWELL** had signatory authority over the Nowell Group, Inc. bank account.

**COUNT 1**  
**Mail Fraud**  
**(18 U.S.C. §§ 1341 and 2)**

1. Paragraphs 1 through 5 of the General Allegations Section of this Information are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around November 1997 through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, the defendant,

**FREDERICK BRADLEY NOWELL, SR.,**  
**a/k/a “Brad Nowell,”**

did knowingly and with intent to defraud devise and intend to devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, knowing that they were false and fraudulent when made, and knowingly causing to be delivered certain mail matter by United States Mail and by a private and commercial interstate carrier, according to the directions thereon, for the purpose of executing the scheme.

### **PURPOSE OF THE SCHEME AND ARTIFICE**

3. It was the purpose of the scheme and artifice for the defendant to embezzle money from the Redland Company by issuing himself unauthorized company checks made payable to “NGI Marine,” depositing the checks into a bank account under his control, using the stolen funds for his personal benefit, and then concealing the theft of funds through the alteration and falsification of the Redland Company’s books and records.

### **MANNER AND MEANS OF THE SCHEME AND ARTIFICE**

The manner and means by which the defendant sought to accomplish the scheme and artifice, included, among others, the following:

4. To perpetrate the fraud, **FREDERICK BRADLEY NOWELL, SR.** maintained the Florida corporation Nowell Group, Inc. **NOWELL** annually paid fees and filed Uniform Business Reports with the Florida Secretary of State in order to keep Nowell Group, Inc. as a current and active corporation within the state. The annual submissions were sent to the Secretary of State by U.S. mail or private carrier.

5. On behalf of Nowell Group, Inc., **FREDERICK BRADLEY NOWELL, SR.** opened and maintained a bank account at NationsBank, later known as Bank of America.

6. **FREDERICK BRADLEY NOWELL, SR.**, having control of the payment of vendor invoices at the Redland Company and signatory authority over the company’s operating bank account, issued and signed numerous unauthorized Redland Company checks payable to “NGI Marine.”

7. **FREDERICK BRADLEY NOWELL, SR.** would deposit the unauthorized Redland Company checks made payable to “NGI Marine” into his Nowell Group, Inc. bank account. Through this scheme, **NOWELL** was able to defraud the Redland Company of approximately \$11 million dollars, which monies **NOWELL** used for travel, gambling, and his general personal benefit.

8. **FREDERICK BRADLEY NOWELL, SR.** concealed the issuance of the unauthorized checks by writing “NGI Marine” only on the negotiable copy of the check, while falsifying the corresponding duplicates of the check to make it appear that the original check had been made payable to an established Redland Company vendor. **NOWELL** would then attach old, legitimate vendor’s invoices to the false duplicates as purported support for the checks, and place and cause to be placed the fraudulent documents in company files.

9. To further conceal the fraud, **FREDERICK BRADLEY NOWELL, SR.** would review the monthly Community Bank of Florida bank account statements for the Redland Company and remove evidence of his wrongdoing. Where the bank statements reflected checks issued to “NGI Marine,” **NOWELL** would alter the documents to make it falsely appear that the checks had been issued to legitimate vendors.

#### **USE OF THE MAILS**

10. On or about January 16, 2003, **FREDERICK BRADLEY NOWELL, SR.**, for the purpose of executing and in furtherance of the aforesaid scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, and attempting to do so, did knowingly cause to be delivered certain

mail matter by United States mail and by a commercial interstate carrier, according to the directions thereon, that is, a 2003 Uniform Business Report on behalf of Nowell Group, Inc. sent from the Southern District of Florida to the Florida Secretary of State in Tallahassee, Florida.

In violation of Title 18, United States Code, Sections 1341 and 2.

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R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

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JOAN SILVERSTEIN  
ASSISTANT UNITED STATES ATTORNEY